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COX ENTERPRISES, INC. and

AETNA LIFE INSURANCE COMPANY

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Attorney for Plaintiff

TODD TOLBERT

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TODD TOLBERT,

Plaintiff,

vs.

COX ENTERPRISES, INC., as Plan
Administrator of the Cox Enterprises, Inc.
Long-Term Disability Coverage Plan;
AETNA LIFE INSURANCE COMPANY,
as Claims Administrator for the Cox
Enterprises, Inc. Long-Term Disability
Coverage Plan; DOES I through V; and
ROE CORPORATIONS I through V,
inclusive,

Defendants.

CASE NO. 2:16-cv-02223-JAD-PAL

**JOINT STIPULATION TO EXTEND
TIME TO RESPOND TO COMPLAINT**

Complaint served on Cox Enterprises,
Inc.: September 22, 2016

Current response date for Cox
Enterprises, Inc.: October 13, 2016

Complaint served on Aetna Life
Insurance Company: October 3, 2016

Current response date for Aetna Life
Insurance Company: October 24, 2016

New response date: November 3, 2016

Complaint Filed: September 21, 2016

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TO THE HONORABLE COURT:

Plaintiff Todd Tolbert (“Plaintiff”) and Defendants Cox Enterprises, Inc. (“Cox Enterprises”) and Aetna Life Insurance Company (“Aetna”) (Cox and Aetna are collectively referred to herein as “Defendants”) (Plaintiff and Defendants are collectively referred to herein as the “Parties”), by and through their counsel of record, hereby agree and stipulate to the following:

- 1) Plaintiff filed his Complaint on September 21, 2016.
- 2) Plaintiff served his Complaint on Cox Enterprises in this matter on September 22, 2016.
- 3) Plaintiff served his Complaint on Aetna in this matter on October 3, 2016.
- 4) Cox Enterprises’ deadline to respond to Plaintiff’s Complaint is currently October 13, 2016.
- 5) Aetna’s deadline to respond to Plaintiff’s Complaint is currently October 24, 2016.
- 6) In order to provide Cox Enterprises sufficient time to prepare its response to Plaintiff’s Complaint, Plaintiff has granted Cox Enterprises an additional 3 weeks from the original date, until and through November 3, 2016, to file its response to his Complaint.
- 7) In order to provide Aetna sufficient time to prepare its response to Plaintiff’s Complaint, Plaintiff has granted Aetna an additional ten days from the original date, until and through November 3, 2016, to file its response to his Complaint.

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1 8) Thus, the Parties hereby stipulate and agree that Defendants shall have until and
2 through November 3, 2016 to file their response to Plaintiff's Complaint.

3 Dated: October 11, 2016

GORDON & REES LLP

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5 By: /s/ Phil W. Su

Robert S. Larsen (SBN 7785)
Phil W. Su (SBN 10450)
300 S. Fourth Street, Suite 1550
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Attorneys for Defendants
COX ENTERPRISES, INC; and
AETNA LIFE INSURANCE COMPANY

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9 Dated: October 11, 2016

LAW OFFICE OF JULIE A. MERSCH

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11 By: /s/ Julie A. Mersch

Julie A. Mersch (SBN 4695)
701 S. 7th Street
Las Vegas, NV 89101
Attorney for Plaintiff
TODD TOLBERT

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15 **IT IS SO ORDERED:**

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17 Dated this 12th day of October, 2016.

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UNITED STATES MAGISTRATE JUDGE

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